REMARKS/ARGUMENTS

Applicant respectfully requests the consideration of the following remarks and the reconsideration of the present application.

Applicant thanks the examiner for pointing out the allowable subject matter in claims 4-5, 9-12, 16-19, 23-24, 28-32, 35-38, 42-43, 47-51 and 54-57.

From the description of the Office Action, it is believed that there are a few typographical errors, such as claim 14 was misidentified as claim 13 and claim 15 was misidentified as claim 14. It is understood that:

claims 1, 6-7, 20, 25-26, 39 and 44-45 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0122044 (hereinafter "Deering");

claims 2-3, 21-22 and 40-41 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of U.S. Patent No. 5,227,863 (hereinafter "Bilbrey");

claims 8, 27 and 46 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of U.S. Patent No. 6,611,260 (hereinafter "Greenberg");

claims 14-15, 33-34 and 52-53 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of U.S. Patent No. 5,648,814 (hereinafter "Munson");

claims 14, 33 and 52 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of U.S. Patent No. 6,828,497 (hereinafter "Yataka"); and

claims 1, 6-7, 14-15, 20, 25-26, 33-34, 39, 44-45 and 52-53 were rejected under 35 U.S.C. 102(b) as being anticipated by Munson.

Applicant respectfully disagrees and submits that the above rejected claims are patentable over the cited references.

Independent claims 1, 20 and 39 were rejected under 35 U.S.C. 102(b) as being anticipated by Munson. However, Munson does not show the claim limitations recited in claims 1, 20 and 39. For example, claim 1 recites:

> 1. (Original) A method to produce visual effect on a display, the method comprising:
> receiving a first time length; and
> adjusting, according to an elapsed time, color correction parameters a plurality of times during a time period of the first length.

Munson does not show "adjusting, according to an elapsed time ... during a time period of the first length". According to Munson, a time period is set to switch from an automatic mode to a manual mode. For example, Munson shows

> "Microcontroller 32 controls the operation of the enumerated elements 22-30 in one of two modes, an automatic mode and a manual mode. Under the automatic mode, microcontroller 32 continually adjusts the brightness and color balance of video images, so they are as close to the "ideal images" as possible, ..." (Col. 4, lines 3-8, Munson)
> "The camera function will stay operating in the automatic adjustment mode for only a predetermined period of time. Once the predetermined period of time has elapsed, the camera function "locks down" the operating parameters for brightness and color balance, and switches to a manual adjustment mode." (Col. 2, lines 2- 7, Munson)

From this description of Munson, it is understood that the system of Munson stays in an automatic mode to adjust brightness and color balance for "ideal images" for a predetermined period of time and then switches to a manual mode after the predetermined period of time. Thus, the predetermined period of time is specified in Munson for the switching from the

automatic mode to the manual mode. During the period of time, the system of Munson adjusts the brightness and color balance automatically to achieve "ideal images". There is no indication that the adjustment of Munson is ***according to the elapsed time*** during the predetermined period of time in the automatic mode.

Thus, the system of Munson performs adjustment in a way substantially different than what is recited in independent claims 1, 20 and 39. Thus, claims 1, 20 and 39 are patentable over Munson at least for the reasons discussed above. The other rejections under 35 U.S.C. 102(b) were based on the rejections for independent claims 1, 20 and 39. Thus, at least for the above reasons, the withdrawal of the rejections under 35 U.S.C. 103(b) is respectfully requested.

Claims 14-15, 33-34 and 52-53 were rejected under 35 U.S.C. 102(b) as being anticipated by Munson. In addition to the reasons discussed above for the corresponding independent claims of claims 14-15, 33-34 and 52-53, Munson does not show the additional limitations recited in claims 14-15, 33-34 and 52-53. For example, claim 14 recites:

> 14. (Original) A method as in claim 1, further comprising:
> restoring, after the time period, the color correction parameters to values that the color correction parameters have before the time period.
>
> 15. (Original) A method as in claim 14, wherein said restoring is performed on expiration of a reservation time period, within which said adjusting the color correction parameters is performed.

The system of Munson "locks down" the operating parameters for brightness and color balance at the end of automatic mode. For example, Munson shows:

"Once the predetermined period of time has elapsed, the camera function "locks down" the operating parameters for brightness and color balance, and switches to a manual adjustment mode." (Col. 2, lines 4-7, Munson).

If the parameters of Munson were restored to the values before the time period – before the automatic mode, the adjustments made in the automatic mode to perfect the images would be lost. This would defeat the purpose of having the automatic mode for the predetermined period of time.

Thus, the system of Munson does not have a feature corresponding to the additional limitations recited in claims 14-15, 33-34 and 52-53.

The independent claims 1, 20 and 39 were also rejected under 35 U.S.C. 103(a) as being unpatentable over Deering. In rejecting the independent claims, the Office Action asserted that Deering discloses the limitation of "adjusting, according to an elapsed time, color correction parameters a plurality of times during a time period of the first length." Applicant respectfully disagrees.

Deering (Par. [0215]) shows:

"In order to correct for time variation in color presentation, the above process for estimating a grid of correction matrices for a display device at a particular time (or in a particular time interval) may be repeated periodically or intermittently, or in response to user request." (Par. [0215], Deering)

However, there is no indication of "adjusting, according to an elapsed time, ... during a time period of the first length" in Deering. In Deering, the system and method performs "color correction based on physical measurements of color component spectra" (Par. [0014], Deering). From the description of Par. [0215] of Deering, it is understood that physical measurements can be time varying. Thus, the process of Deering may be repeated

periodically or intermittently to correct for time variation. There is no indication that the adjustment of Deering is ***according to the elapsed time*** during a time period.

The Office Action relied upon the mention of "a particular time interval" in Par. [0215] in Deering to suggest a modification to "include the receipt of a first time to adjust color correction parameter; in order to allow a user to control the amount of time it takes a system to perform a predetermined task". However, such a suggested modification is clearly inconsistent with the teaching of Deering.

In Deering, the "particular time interval" is mentioned for the process to be performed periodically or intermittently. Thus, within the particular time interval, the process of "estimating a grid of correction matrices" is not performed. This is dramatically different from what is recited in the independent claims.

Thus, independent claims 1, 20 and 39 are patentable over Deering at least for the above reasons. The other rejections under 35 U.S.C. 103(a) were based on the rejections for independent claims 1, 20 and 39. Thus, at least for the above reasons, the withdrawal of the rejections under 35 U.S.C. 103(a) is respectfully requested.

Note that the rejection for claims 14-15, 33-34 and 52-53 under 35 U.S.C. 103(a) over Deering in view of Munson relied upon Munson for the limitation of "restoring, after the time period, the color correction parameters to values that the color correction parameters have before the time period". However, as discussed above, Munson does not have a feature corresponding to the additional limitation recited in claims 14-15, 33-34 and 52-53. Thus, the withdrawal of the rejections for claims 14-15, 33-34 and 52-53 under 35 U.S.C. 103(a) over Deering in view of Munson is respectfully requested.

Claims 8, 27 and 46 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of Greenberg (Col. 2, lines 61-63). However, according to Deering, the process of "estimating a grid of correction matrices" is performed periodically or

intermittently to correct the time variation based physical measurements. It is not clear how the modification proposed in the Office Action can achieve the goal of "reliable, low in cost and which has improved silicon area usage". The modification seems to be irrelevant with respect to silicon area usage; and the modification would appear to actually lead to a less reliable, inefficient system. Furthermore, Greenberg does not show "a frequency for said ***adjusting the color correction parameters.***" Thus, the withdrawal of the rejections for claims 8, 27 and 46 under 35 U.S.C. 103(a) as being unpatentable over Deering in view of Greenberg is respectfully requested.

Claims 14, 33 and 52 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of Yataka (Col. 6, lines 19-29). Yataka discloses storing default values of the parameters in a ROM so that the parameters can be restored to the default values by ***user's resetting operation***. In view of Deering and Yataka, one person skilled in the art would not arrange a system the periodically, or intermittently, update the estimation of "a grid of correction matrices" only to lose the updated estimation of "a grid of correction matrices" to the reinstated default values. Thus, the withdrawal of the rejections for claims 14, 33 and 52 under 35 U.S.C. 103(a) as being unpatentable over Deering in view of Yataka is respectfully requested.

Claims 2-3, 21-22 and 40-41 were rejected under 35 U.S.C. 103(a) as being unpatentable over Deering in view of Bilbrey. The Office Action asserted that

> "Bilbrey teaches a look up table for gamma correction (see, col. 14, lines 12-45); and a real time clock, which measures time during production of the visual effect (see, col. 16, lines 39-42); and blending the input color signals with a color according to the elapsed time (see, col. 99, lines 52 to col. 100, line 6)".

However, Bilbrey (col. 99, lines 52 to col. 100, line 6) does not show "**blending** *the input color signals* **with** *a color* according to the elapsed time". It only describes the use of multiplier array for blending.

Further, Bilbrey (col. 16, lines 39-42) does not show "a real time clock, which measures time during production of the visual effect". It only shows that special video effects may be performed in real time with the system 10. A person skilled in the art understands that the phrase "in real time" cannot be interpreted as "a real time clock".

Further, for example, claim 2 recites:

> 2. (Original) A method as in claim 1, wherein the color correction parameters comprise at least one look up table for gamma correction; and wherein said elapsed time is measured by a real time clock which measures time during production of the visual effect.
>
> 3. (Original) A method as in claim 2, wherein the at least one look up table is adjusted to blend input color signals with a color; and wherein the input color signals is blended with the color according to the elapsed time.

The system of Deering (Par. [0215]) adjusts the estimation of "a grid of correction matrices". Including a look up table for gamma correction of Bilbrey in the system of Deering would not have a system which adjusts the look up table for gamma correction, or more specifically, adjusts the look up table for gamma correction in a particular way to **blend** *input color signals* **with** *a color*. Neither Deering nor Bilbrey suggested that such adjusting to blend is according to the elapsed time measured by a real time clock. Thus, the withdrawal of the rejections for claims 2-3, 21-22 and 40-41 under 35 U.S.C. 103(a) as being unpatentable over Deering in view of Bilbrey is respectfully requested.

In summary, Applicant respectfully submits that the pending claims are patentable over the cited references.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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Lehua Wang
Reg. No. 48,023

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025-1026
(408) 720-8300